

EXHIBIT 1

Gandhi v. Dell

Plaintiffs' Definitions of "Business Sales Representative" Class

- Call center sales reps required to take inbound phone calls on a scheduled shift
(Complaint at ¶¶ 8 & 11)
- Telephone-dedicated employees in call centers whose primary job duty is selling to business customers
(Gandhi's discovery requests to Dell)
- All had "Inside Sales Representative" job description
(Plaintiffs' certification motion at 5 and Exhibit ¹⁴A.)

64 Plaintiffs Have Opted In through October 14

- 4 apparently never sales representatives at Dell
- *All* of the opt-in employees (60/60):
 - were employed in Small & Medium Business (SMB) unit
 - worked on inbound telephone routing sales queues → *no*
 - worked on a shift scheduled by Call Center Operations
- Almost all were ISR IBs (57/60)
 - 1 never progressed beyond ISR ID
 - 2 started as ISR I

Gandhi v. Dell

Class Definition Proposal

1. Inside Sales Representatives
who worked in
2. Inbound telephone routing queues
on a
3. Shift scheduled by Call Center Operations
in
4. Dell's Small & Medium Business (SMB) Unit

Who Should Get Notice – ISR Is in SMB

Meet Class Definition	Don't Meet Class Definition
SMB ISR IB, IC, ID, some ISR I*	All other ISRs
<ul style="list-style-type: none">▪ Transactional sales▪ Call center based▪ Take inbound calls in routing queue▪ Have no assigned accounts▪ Must be on phones during scheduled shifts▪ <i>Covers all consent filers</i>	<ul style="list-style-type: none">▪ Relationship sales▪ Not in telephone routing queue▪ Make outbound calls and emails▪ Have assigned accounts▪ Do not have telephone shifts▪ <i>Excludes no consent filers</i>

* SMB ISR Is who opt in but do not meet the class definition can be removed